

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRIAN CRAWFORD Debtor	: : :	CHAPTER 13  CASE NO. 5-14-04414
--------------------------	-------------	---------------------------------------

**DEBTOR'S ANSWER TO THE MOTION OF  
FOR RELIEF FROM THE AUTOMATIC STAY UNDER §362**

Debtor Brian Crawford, through his undersigned counsel, hereby responds to the Motion for Relief from the Automatic Stay filed by Select Portfolio Servicing, Inc. as follows:

1. Denied. Debtor does not have sufficient information to admit or deny the averments contained in paragraph 1.
2. Admitted.
3. Admitted.
4. Denied. To the extent the averments herein contain legal conclusions, no response is necessary. As to all other averments, strict proof of the averments are required at the time of trial.
5. Denied. To the extent the averments herein contain legal conclusions, no response is necessary. As to all other averments, strict proof of the averments are required at the time of trial.
6. Admitted.
7. Denied. Strict proof of the averments are required at the time of trial.
8. Denied. Strict proof of the averments are required at the time of trial.
9. Denied. Strict proof of the averments are required at the time of trial.
10. Denied. Strict proof of the averments are required at the time of trial.

11. Denied. Strict proof of the averments are required at the time of trial. To the extent the averment no response is required.

11. Denied. Strict proof of the averments are required at the time of trial. To the extent the averment no response is required.

12. Denied. Strict proof of the averments are required at the time of trial.

13. Denied. Strict proof of the averments are required at the time of trial.

14. Denied. Strict proof of the averments are required at the time of trial.

15. Denied. Strict proof of the averments are required at the time of trial.

16. Denied. Strict proof of the averments are required at the time of trial.

Movant has not alleged any cause to avoid the 14 day stay under Rule 4001(a)(3). Further, Debtor's proposed Plan provides for the mortgage to be modified to reflect a current value for the property of \$149,900.00. If the value is reduced, the Debtor and non-debtor, co-obligor would be able to pay the mortgage on a "current" basis.

**WHEREFORE**, the Debtor respectfully requests that this Honorable Court enter an Order denying the Relief requested by Select Portfolio Servicing, Inc. and for such other and further relief is just and appropriate.

Respectfully submitted,

**CONWAY LAW OFFICES, P. C.**

/s/ Mark J. Conway  
MARK J. CONWAY (ID #59114)  
502 S. Blakely Street  
Dunmore, PA 18512  
Phone (570) 343-5350  
Fax (570) 343-5377

Attorney for Debtor

DATED: April 13, 2017

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRIAN CRAWFORD Debtor	: : :	CHAPTER 13  CASE NO. 5-14-04414
--------------------------	-------------	---------------------------------------

**CERTIFICATE OF SERVICE**

I, Amy L. Marta, Paralegal hereby certify that I caused a true and correct copy of the foregoing Answer to the Motion for Relief From Automatic Stay Under §362 to be served via e-mail to the following:

Charles J. DeHart, III  
Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
[dehartstaff@pamd13trustee.com](mailto:dehartstaff@pamd13trustee.com)

Matthew C. Waldt, Esquire  
1 E. Stow Road  
Marlton, NJ 08053  
[mwaldt@milsteadlaw.com](mailto:mwaldt@milsteadlaw.com)

**CONWAY LAW OFFICES, P.C.**

/s/ Amy L. Marta  
\_\_\_\_\_  
Amy L. Marta, Paralegal  
502 S. Blakely Street  
Dunmore, PA 18512  
Phone (570) 343-5350  
Fax (570) 343-5377

DATED: April 13, 2017